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Attorneys for Hayes Lemmerz International, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

DELPHI CORPORATION, et al

Case No. 05-44481 (RDD)

Debtors.

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(Jointly Administered)

**RESPONSE OF HAYES LEMMERZ INTERNATIONAL, INC. (ON BEHALF OF  
ITSELF AND ITS AFFILIATES AND SUBSIDIARIES) TO DEBTORS' FOURTH  
OMNIBUS OBJECTION (PROCEDURAL) UNDER 11 U.S.C. § 502(b) AND FED. R.  
BANKR. P. 3007 TO CERTAIN DUPLICATE AND AMENDED CLAIMS**

Hayes Lemmerz International, Inc., on behalf of its affiliates and subsidiaries Hayes Lemmerz International – Wabash, Inc., Hayes Lemmerz International – Homer, Inc. and Industrias Fronterizas HLI S.A. de C.V. (collectively “Hayes”), states the following in support of its response to Debtors’ Fourth Omnibus Claims Objection (Procedural) under 11 U.S.C. § 502(b) and Fed. R. Bankr. 3007 to Certain Duplicate and Amended Claims (“Fourth Omnibus Objection”):

1. On October 8, 2005 (“Petition Date”), Delphi and various affiliates and/or subsidiaries (collectively “Debtors”) filed a petition for relief under chapter 11 of the United States Bankruptcy Code.

2. Hayes purchases component parts from Debtors under certain purchase orders (“Hayes Purchase Orders”). Debtors also purchase various component parts from Hayes under certain purchase orders (“Delphi Purchase Orders”).

3. On July 28, 2006, Hayes filed its proof of claim against Delphi Automotive Systems, LLC (“Automotive Systems”) in the amount of \$499,401.49, of which amount \$379,814.40 is secured [Claim No. 11979] (“Automotive Systems Claim”). On July 28, 2006, Hayes also filed its proof of claim against Delphi Corporation in the amount of \$499,401.49, of which amount \$379,814.40 is secured [Claim No. 11980] (“Delphi Corporation Claim”). The Automotive Systems Claim and Delphi Corporation Claim both state expressly that Hayes only seeks one recovery.

4. In the Fourth Omnibus Objection, Debtors seek to expunge and disallow the Delphi Corporation Claim because it is duplicative.

5. Hayes’ counsel has been in negotiation with Debtors’ counsel to resolve Hayes’ request to recoup amounts owed to Hayes by Debtors from amounts owed to Debtors by Hayes. These negotiations are ongoing and will affect the ultimate amount of Hayes’ claim. Also, at this time, Hayes is reviewing its books and records to determine whether the Automotive Systems Claim and the Delphi Corporation Claims are duplicative. Because of the recent holiday season, and the virtual shutdown of the North American automotive industry that accompanies this time period, Hayes has not completed its review of its books and records as of the date of the response deadline to the Fourth Omnibus Objection.

6. Any reply to this Response should be addressed to the following:

Ralph E. McDowell  
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7. The contact information for persons who possess the authority to reconcile, settle or otherwise resolve the Fourth Omnibus Objection to the claim on behalf of Hayes is:

Ralph E. McDowell  
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8. Hayes reserves all of its rights and remedies under the Hayes Purchase Orders, and nothing in this Response constitutes or should be construed to waive those or any other rights.

### **RELIEF REQUESTED**

THEREFORE, Hayes respectfully requests that the Court deny the relief requested under the Fourth Omnibus Objection as to the Delphi Corporation Claim and Automotive Systems Claim and allow Hayes further time to review its books and records to determine whether the Delphi Corporation Claim and Automotive Systems Claim are duplicative.

Dated: January 3, 2007

BODMAN LLP

By:           /s/          Ralph E. McDowell            
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